## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

In re GRAÑA Y MONTERO S.A.A. : SECURITIES LITIGATION :	: Civil Action No. 2:17-cv-01105-LDH-ST
	: : <u>CLASS ACTION</u>
This Document Relates To:	: NOTICE OF UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS
ALL ACTIONS.	ACTION SETTLEMENT, CERTIFICATION OF THE SETTLEMENT CLASS, AND
· <u> </u>	APPROVAL OF NOTICE TO THE

SETTLEMENT CLASS

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiff Treasure Finance Holding Corp. and plaintiff

Marcia Goldberg ("Plaintiffs") will move this Court, on a date and time as may be designated by the

Court, at the United States District Court for the Eastern District of New York at 225 Cadman Plaza

East, Brooklyn, NY 11201, for an order: (i) granting preliminary approval of the proposed

Settlement of this putative securities class action, pursuant to Federal Rule of Civil Procedure 23(e);

(ii) certifying the proposed Settlement Class for purposes of the Settlement; (iii) approving the form

and manner of notice of the proposed Settlement to the Settlement Class; and (iv) setting a date for

final approval thereof, and a schedule for various deadlines relevant thereto. In support of this

motion, Plaintiffs submit the accompanying Memorandum of Law, Stipulation and Agreement of

Settlement, and a [Proposed] Order.

DATED: July 2, 2020

Respectfully submitted,

**ROBBINS GELLER RUDMAN** & DOWD LLP SAMUEL H. RUDMAN DAVID A. ROSENFELD ALAN I. ELLMAN

s/David A. Rosenfeld

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Additional Counsel for Plaintiffs

## **CERTIFICATE OF SERVICE**

I, David A. Rosenfeld, hereby certify that on July 2, 2020, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel registered to receive such notice.

s/ David A. Rosenfeld
DAVID A. ROSENFELD